



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

July 26, 2016

Mr. Eric Gasch  
U.S. Army Corps of Engineers  
Wilmington District  
69 Darlington Avenue  
Wilmington, North Carolina 28403

**Subject: EPA Review Comments on the Final Environmental Impact Statement (FEIS) for the Morehead City Harbor Integrated Dredge Material Management Plan, Port of Morehead City, N.C.; CEQ #20160128**

Dear Mr. Gasch:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject U.S. Army Corps of Engineers' (Corps) FEIS in accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. It is our understanding that the Corps initiated this Dredge Material Management Plan (DMMP) and subsequent FEIS for Morehead City Harbor to address dredging needs, disposal capabilities, capacities of disposal areas, environmental compliance requirements, and potential for beneficial use of dredged material and indicators of continued economic justification. We also understand that the intent of the plan is to provide sufficient disposal capacity for the 20-year period beginning in 2016 and extending through 2035.<sup>1</sup>

The EPA reviewed the Draft Environmental Impact Statement (DEIS) for the subject project and provided comments in a letter dated February 3, 2014. Our primary concerns outlined in our previous letter related to consideration of sea level rise and storm surge impacts when modeling for disposal sites, determination of sand compatibility, and ensuring compliance with State water quality standards. The EPA acknowledges the separate detailed responses to comments provided in Appendix L of the FEIS. The EPA has reviewed Appendix L and the FEIS and notes that the Corps has substantially responded to most of our comments provided on the DEIS. However, the EPA has two remaining environmental concerns relating to estimating and quantifying greenhouse gas (GHG) emissions from the proposed activities and providing adequate monitoring and adaptive management for dredge material disposal activities.

In future analyses, the EPA recommends that the Corps estimate the direct and indirect GHG emissions caused by the proposal and its alternatives, including construction and operation emissions. Examples of tools for estimating and quantifying GHG emissions can be found on

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<sup>1</sup> p. XS-1

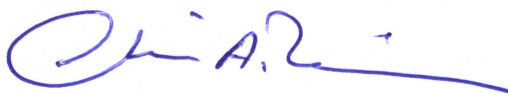
Council on Environmental Quality's (CEQ) website.<sup>2</sup> These emissions levels can serve as a reasonable proxy for climate change impacts when comparing the alternatives and considering appropriate mitigation measures.

The EPA recommends that future NEPA analyses describe measures to avoid, reduce, and compensate for GHG emissions caused by the proposal, including reasonable alternatives and practicable mitigation opportunities, and disclose the estimated associated GHG reductions. For example, the Corps could consider fuel efficient construction machinery. For the proposed project, the EPA recommends that the Corps consider commitments in the record of decision (ROD) to implement reasonable mitigation measures that would reduce project-related GHG emissions. Any proposed adaptive management strategies should also be identified in the ROD.

In addition, the EPA requests that any reported exceedances to water quality standards associated with dredge material disposal activities be reported to the North Carolina Department of Environmental Quality - Water Quality Section and the EPA Region 4's Water Protection Division and be shown as a project commitment in the ROD and Chief's Report.

The EPA appreciates the opportunity to review the FEIS. Should the Corps have questions regarding our comments, please feel free to contact Mr. Dan Holliman of my staff at (404) 562-9531 or [holliman.daniel@epa.gov](mailto:holliman.daniel@epa.gov).

Sincerely,



Christopher A. Militscher  
Chief, NEPA Program Office  
Resource Conservation and Restoration Division

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<sup>2</sup> [https://ceq.doe.gov/current\\_developments/GHG\\_accounting\\_methods\\_7Jan2015.html](https://ceq.doe.gov/current_developments/GHG_accounting_methods_7Jan2015.html)